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13 *Attorneys for Defendant Ashley Furniture
Industries, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOND MANUFACTURING CO., INC., a
California corporation

Plaintiff,

VS.

ASHLEY FURNITURE INDUSTRIES, INC., a Wisconsin corporation.

Defendant.

CASE NO.: 2:17-cv-01522-JCM-DJA

**STIPULATION TO STAY BRIEFING OF
DEFENDANT ASHLEY'S MOTION TO
STRIKE**

(Second Request)

ASHLEY FURNITURE IND.
Wisconsin corporation,

Defendant.

Pursuant to Local Rules IA 6-1, 6-2, and 7-1, Plaintiff BOND MANUFACTURING CO., INC. ("Bond") and Defendant ASHLEY FURNITURE INDUSTRIES, INC. ("Ashley"), by and through their undersigned counsel, submit this Stipulation to Stay Briefing of Ashley's Motion to Strike Bond's Infringement Contentions, or in the Alternative, Motion to Compel Amendment of

Pursuant to Local Rules IA 6-1, 6-2, and 7-1, Plaintiff BOND MANUFACTURING CO., INC. ("Bond") and Defendant ASHLEY FURNITURE INDUSTRIES, INC. ("Ashley"), by and through their undersigned counsel, submit this Stipulation to Stay Briefing of Ashley's Motion to Strike Bond's Infringement Contentions, or in the Alternative, Motion to Compel Amendment of

1 Same (“Motion to Strike”). *See* Motion to Strike, ECF No. 70; Order On Stipulation To Stay
2 Briefing On Defendant Ashley’s Motion To Strike, ECF No. 75.

3 The Parties’ prior stay was contingent upon Ashley’s assessment of Bond’s compliance
4 with LPR 1-6 and 1-7 disclosures. *Id.* Bond’s deadline to oppose the Motion to Strike was April
5 20, 2020, but Bond believes it cannot fully supplement its patent infringement disclosures until
6 Ashley responds to Bond’s outstanding discovery requests. However, due to COVID-19, Ashley
7 is unable to complete its responses to the requests at this time. Ashley is headquartered in
8 Wisconsin and Florida, both of which are under stay at home orders, effectively eliminating its
9 employee’s access to documents necessary for discovery responses. Communication with
10 necessary parties in China, as well as access to essential documents and information in that
11 country, is difficult if not impossible given the global pandemic.

12 Additionally, though the deadline to oppose the Motion to Strike has passed, good cause
13 exists under LR IA 6-1(a) to extend the time for the same. The national health emergency has
14 made communications difficult, and despite diligence from the parties, counsel could not complete
15 a stipulation in advance of the deadline. Nevertheless, both parties agree that the briefing should
16 be extended, especially given their separate request to extend the deadlines identified in the
17 scheduling order out 90 days.

18 Accordingly, compelling circumstances exist that justify the requested stay of briefing.
19 The Parties have agreed to a prolonged extension to accommodate the current uncertain

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1 circumstances. Bond's Response shall be due in 90 days, on July 20, 2020 with Ashley's Reply
2 due in the ordinary course.

3 DATED this 23rd day of April, 2020.

4 WEIDE & MILLER, LTD.

5 /s/ *F. Christopher Austin*

6 F. Christopher Austin, Esq. (NSBN 6559)
7 10655 Park Run Drive, Suite 100
8 Las Vegas, NV 89144

9 *Attorneys for Plaintiff,
10 Bond Manufacturing Co., Inc.*

11 DATED this 23rd day of April, 2020

12 McDONALD CARANO LLP

13 /s/ *Rory T. Kay*

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27 *Attorneys for Defendant,
28 Ashley Furniture Industries, Inc.*

16 **IT IS SO ORDERED.**

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: April 27, 2020